

October 30, 2023

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Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007
Tel (212) 805-0294
Courtroom 619

Re: *FTC v. IQVIA Holdings Inc. and Propel Media, Inc.*, Case No.: 1:23-cv-6188
(S.D.N.Y.); Letter Motion to Seal Exhibits to Letter Motion re Disclosure of
Confidential Information to Designated In-House Counsel

Dear Judge Ramos:

Pursuant to this Court's Rule of Individual Practice 3(ii), Defendant IQVIA Holdings Inc. ("IQVIA") respectfully submits this letter motion requesting the Court's approval to file fully under seal Exhibits A and B in support of its October 30, 2023 Letter Motion re Disclosure of Confidential Information to Designated In-House Counsel.

These exhibits reference information that the FTC has designated as Confidential Information under the terms of this Court's Amended Protective Order, Dkt. No. 153, and which the FTC has filed under seal and asserted protected from disclosure under 15 U.S.C. §§ 18a(h); 46(f); 57b-2(b), (c), and 16 C.F.R. §4.10(b), *see* ECF No. 167.

Under Paragraph 10 of the Amended Protective Order, when a party files materials that have been designated as Confidential Information, "the Court shall be so informed by the Party filing such papers, and such papers shall be filed under seal."

For the reasons stated above, Defendant respectfully moves this Court for an order permitting the Exhibits to be filed under seal.

Sincerely,

/s/ Chantale Fiebig

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